

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA,
NORTHERN DIVISION**

LARRY FITZPATRICK,
 Plaintiff,
 vs.
CITY OF MONTGOMERY,
 Defendant.

)
) **Case No. 2:07-cv-528-WHA**
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)
) **DEFENDANT’S REQUESTED**
) ***VOIR DIRE***
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)

COMES NOW the defendant, City of Montgomery, by and through undersigned counsel, and requests that the following questions be asked of the jury panel prior to jury selection in the above case.

1. Has any member of the venire ever submitted a claim or lawsuit against the City of Montgomery?
2. Has any member of the venire received an unfavorable ruling on any issue from the Montgomery City Council, or any City board or administrative department?
3. Has any member of the venire ever felt that they were discriminated against either in their treatment in a job, or in the selection process for a job?
4. Has any member of the venire ever submitted a complaint to the EEOC?
5. Has any member of the venire ever been fired or terminated from a job for poor or improper work performance?
6. Has any member of the venire ever been disciplined or reprimanded by a supervisor for insubordination?
7. Has any member of the venire ever worked as a mechanic, or in a job which involved repairing or servicing automobiles or heavy equipment?

Respectfully submitted,

/s/ Wallace D. Mills
Wallace D. Mills (MIL 090)
Attorney for Defendants

OF COUNSEL:

City of Montgomery Attorney's Office
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Montgomery, AL 36101-1111
Phone: (334) 241-2050
Fax: (334) 241-2310

CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of July, 2008, I electronically filed the foregoing with the Clerk of the court using the CM/ECF system which will send notification of such filing to the following parties or counsel:

Joseph Charles Guillot, Esq.
McPhillips Shinbaum LLP
P.O. Box 64
Montgomery, AL 36101-0064

and I hereby certify that I have also mailed by United States Postal Service the document to the above-named non-CM/ECF participants:

NONE

/s/Wallace D. Mills
Of Counsel